

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE: § CASE NUMBER: 16-42956
LUIS ACEVEDO §
DEBTOR §
§ CHAPTER 13

AMENDED RESPONSE TO TRUSTEE'S NOTICE OF
AMOUNT DEEMED NECESSARY TO CURE
(In Response to Docket Entry 66)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes Now, Carrington Mortgage Services, LLC servicing for Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust A ("Creditor"), responding to Trustee's Notice of Amount Deemed Necessary to Cure (Mid Case Audit Per Local Bankruptcy Rule 3002-2) (the "Notice"), filed February 14, 2018 at Docket Entry 66, and in support hereof would show the Court as follows:

1.) Creditor **AGREES** that as of the Date of the Notice, the Trustee has disbursed \$3,099.27 on Creditor's \$24,065.62 claim (Proof of Claim No. 3). Pre-petition arrearage of \$20,966.35 remain unpaid.

2.) Creditor **AGREES** that as of the Date of the Notice, the Trustee has disbursed \$378.40 on Creditor's \$3,287.10 post-petition claim (Proof of Claim No. 3-2). Post-petition arrearage of \$2,908.70 remain unpaid.

3.) Creditor **STATES** that the Debtor is currently paying the ongoing mortgage payment through the Conduit program. Pursuant to the Trustee's records, the Conduit Mortgage payments commenced May 15, 2017 and are current as of July 17, 2018.

WHEREFORE, PREMISES CONSIDERED, Carrington Mortgage Services, LLC servicing for Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage

Loan Trust A requests that this Court approve the Trustee's Motion to Deem the mortgage claim to the extent of the above described outstanding amount, and for such other and further relief as this Court deems just.

RESPECTFULLY SUBMITTED,

By: 

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ATTORNEYS FOR CREDITOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Amended Response to Trustee's Notice of Amount Deemed Necessary to Cure was served on all persons filing a Notice of Appearance, Request for Notices, or a Proof of Claim by CM/ECF delivery, and on the parties listed below, at the addresses indicated, via CM/ECF delivery or by deposit in the United States Mail, first-class postage pre-paid on August 7, 2018.

DEBTOR(S):

Luis Acevedo
7623 Dandy Lane
Dallas, TX 75227

DEBTOR'S ATTORNEY:

Andrew B. Nichols
Law Office of Andrew B. Nichols
990 S. Sherman Street
Richardson, TX 75081

BANKRUPTCY TRUSTEE:

Tim Truman
6851 N.E. Loop 820, Suite 300
N Richland Hills, TX 76180

U.S. TRUSTEE:

US Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242

By: 

Mario Cortes